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2 United States Attorney  
3 Eastern District of Washington  
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10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,  
13  
14 Plaintiff,

15 vs.

16 CARLOS REYES-SANTANA,  
17 EDUARDO REYES-SANTANA,  
18 MOLLY MARGRET BROWN,

19 Defendants.

No. 4:21-CR-06022-SAB-1  
4:21-CR-06022-SAB-2  
4:21-CR-06022-SAB-4

BILL OF PARTICULARS FOR  
FORFEITURE OF PROPERTY

20 The United States of America, by and through Vanessa R. Waldref, United  
21 States Attorney for the Eastern District of Washington, and Caitlin A. Baunsgard,  
22 Assistant United States Attorney, hereby files this Bill of Particulars for Forfeiture of  
23 Property.

24 The Indictment filed May 26, 2021, contains a Notice of Criminal Forfeiture  
25 providing notice that the United States is seeking forfeiture of property pursuant to  
26 21 U.S.C. § 853. ECF No. 47 at 2-3.

1 The United States hereby gives notice that the United States is seeking  
2 forfeiture of the following assets from the Defendants as listed below:

3 Defendant Carlos Reyes-Santana

- 4 - \$420,150.00 U.S. Currency;
- 5 - \$70,150.00 U.S. Currency (storage unit)
- 6 - Beretta USA Corp 92X 9mm pistol, serial number: 92X0003458,  
7 magazine and ammunition;

8 Defendant Eduardo Reyes-Santana

- 9 - 2017 Mercedes CLA, Washington License BXC3513, VIN:  
10 WDDSJ4GBXHN431714

11 Defendant Molly Margret Brown

- 12 - \$5,071.00 U.S. Currency

13 DATED: October 27, 2021

14  
15  
16 Vanessa R. Waldref  
17 United States Attorney

18 s/ Caitlin A. Baunsgard  
19 Caitlin A. Baunsgard  
20 Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Richard A. Smith  
Attorney for Defendant Carlos Reyes-Santana  
[rasmith@house314.com](mailto:rasmith@house314.com)

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*s/ Caitlin A. Baunsgard*

Caitlin A. Baunsgard

Assistant United States Attorney